

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

KIMBRA CRISWELL,	)	
	)	
Plaintiff,	)	
v.	)	C.A. No. 05-CV-00321 GMS
	)	
LYDIA ADAIR MCFADDEN and CHRISTIANA	)	
CARE HEALTH SERVICES, INC.,	)	JURY TRIAL DEMANDED
	)	
Defendants.	)	

**NOTICE OF RECORDS DEPOSITION**

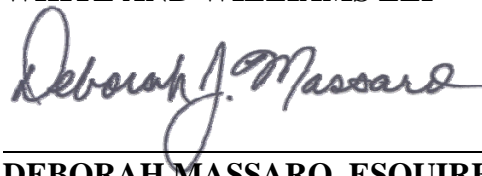
**PLEASE TAKE NOTICE** that the undersigned attorney will take the records deposition of **Dr. Raymond DiPretoro, Jr., Dr. Peter Wetherill, Christiana Spine Center, Pro Physical Therapy, Lawall Prosthetics and Orthotics, Wilmington Pain Center, Dr. D. Bhaskar Rao, Dr. Lisa M. Leschek-Gilman, Dr. Richard Schumann, Neurology Associates, P.A. and Dr. Schwartzman** on **May 22, 2006** beginning at 10:00 a.m. in the offices of **WHITE and WILLIAMS LLP**, 824 North Market Street, Suite 902, Wilmington, Delaware 19801.

**Duces Tecum:**

**Produce a complete copy of all medical records, including but not limited to all in-patient and out-patient from date of initial treatment date to the present relating to Kimbra Criswell; DOB: 11/2/78.**

**Note: *Personal appearance has been waived if the requested records and affidavit of substitute compliance are received in this office prior to the date of the scheduled deposition.***

**WHITE AND WILLIAMS LLP**

A handwritten signature in dark ink, reading "Deborah J. Massaro". The signature is written in a cursive style with a large, looped initial "D".

By:

**DEBORAH MASSARO, ESQUIRE**

824 Market Street, Suite 902

P.O. Box 709

Wilmington, DE 19899

(302) 654-0424

*Attorney for Defendants,*

*Lydia Adair McFadden*

*and Christiana Care Health Services, Inc.*

Date: May 8, 2006

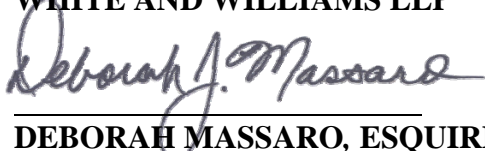
**CERTIFICATE OF SERVICE**

I, Deborah Massaro, Esquire, certify that on this 8<sup>th</sup> day of May, 2006, two copies of the foregoing **NOTICES OF RECORDS DEPOSITION** were delivered by regular U.S. mail, postage prepaid, to the following individuals:

Richard R. Wier, Jr., Esquire  
Law Offices of Richard R. Wier, Jr., P.A.  
1220 Market Street, Suite 600  
Wilmington, DE 19801

**WHITE AND WILLIAMS LLP**

By:



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*Lydia Adair McFadden*

*and Christiana Care Health Services, Inc.*